

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

TWELVE SIXTY LLC, et al.,

Plaintiffs,

v.

EXTREME MUSIC LIBRARY
LIMITED, et al.,

Defendants.

Civil Action No. 17-1479

**DECLARATION OF
CHRIS WOODS**

I, Chris Woods, hereby declare as follows:

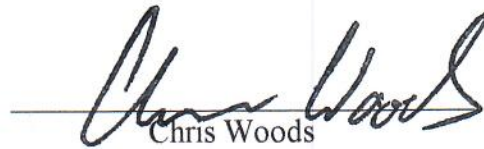
1. I am the Chief Operating Officer for TuneSat, LLC (“TuneSat”), and I make this declaration based upon my personal knowledge and review of relevant documents produced by non-party TuneSat in this matter.

2. In response a non-party subpoena from Twelve Sixty, LLC, Aron Marderosian, and Robert Marderosian, as well as a non-party subpoena from Extreme Music Limited and Extreme Music Library Limited, TuneSat produced a detection export spreadsheet in native format bearing Bates number TS000769 (file name TS000769-CONFIDENTIAL.csv). That spreadsheet contains data for 31,296 detections, which was exported using the expanded view from the TuneSat web portal. This is the total number of detections that were available in the account at that time. Each row in the spreadsheet represents a single detection. The “usage count” column in the expanded view of the spreadsheet identifies the number of times an identical detection appears in the same spreadsheet. Stated differently, because each individual detection is separately displayed in its own row in the expanded view, the “usage count” reflects the number of rows of common detections, and thus, the same “usage count” number appears in each row of

all of the common detections. For the sake of clarity, the “usage count” numbers do not represent additional detections beyond the 31,296 detections (one detection per row) identified in the spreadsheet.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: December 7, 2018


Chris Woods